



of Southwestern Michigan  
420 Alcott Street Kalamazoo, MI 49001  
Phone/TTD (269) 382-0490 Fax (269) 382-6836  
Equal Opportunity Employer Program  
Michigan Relay Center 1-800-649-3777 (Voice and TTY)  
[www.goodwillswmi.org](http://www.goodwillswmi.org)  
"The Business of Changing Lives"



EPA Region 5 Records Ctr.



312128

November 29, 2010

Mr. Michael Berkoff  
Remedial Project Manager  
U.S. EPA Region 5  
Superfund Division  
Remedial Response Section #3  
Chicago, IL 60604

RE: Portage Creek Superfund Site

Dear Mr. Berkoff:

Goodwill Industries of Southwestern Michigan resides on the Allied Paper/Portage Creek/Kalamazoo River Superfund Site. We appreciate the opportunity to provide input into the final solution for the area. **Goodwill prefers Alternate 3 – Total Removal and Offsite Disposal with some modifications that would save the EPA money and liability.**

We note that the paved lots on our property would be slated for total removal and offsite disposal in the process according to the map provided. Testing done prior to receiving the building from Stryker by Gove and Associates would seem to make that solution extreme. While parts of paved lot area are contaminated, most of the area is not. We would suggest reviewing the data from our testing and conducting additional soil and groundwater testing to fill in any gaps you see in the data to determine the exact scope of parking area removal. Our concerns with TOTAL parking lot removal include:

1. Inability to function as an ongoing entity. The paved lots encompass 80% of our parking and delivery areas.
2. Potential damage to our building foundation. Entirely removing the paved lots could undermine our building itself and render it useless with soil shifting.

Again, we thank you and the EPA for this opportunity for input. Please keep us informed as the process unfolds.

Cordially,

John E. Dillworth  
President/CEO

*Goodwill Industries of Southwestern Michigan, a not-for-profit organization, provides employment, education, and training services to people who live with disabling conditions and other special needs to maximize their employment potential. Auxiliary aids and services available to individuals with disabilities upon request.*  
Equal Opportunity Employer Program. A United Way Agency.



420 East Alcott Street  
Kalamazoo, MI 49001

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